

Mr. Ken Sears
Polyfoam Packers Corp., a Division of Tuscarora, Inc.
955 Woodland Avenue
Michigan City, IN 46360

Re: 091-15886
Minor Source Modification to:
Part 70 permit No.: T 091-7666-00079

Dear Mr. Sears:

Polyfoam Packers Corp., a Division of Tuscarora, Inc. was issued Part 70 operating permit T 091-7666-00079 on October 14, 1999, for a polystyrene shape molding operation. An application to modify the source was received on July 17, 2002. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

1. Two (2) molding presses, model type Kurtz K813, identified as MP28 and MP29, each rated at 150 pounds per hour.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

3. Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.
6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

The source may begin construction and operation when the minor source modification has been issued. Operating conditions shall be incorporated into the Part 70 operating permit as a minor permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call (800) 451-6027, press 0 and ask for Madhurima Moulik or extension 3-0868, or dial (317) 233-0868.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

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cc: File - LaPorte County
LaPorte County Health Department
Northwest Regional Office
Air Compliance Section Inspector - Rick Massoels
Compliance Data Section - Karen Nowak
Administrative and Development
Technical Support and Modeling - Michele Boner

MINOR SOURCE MODIFICATION OFFICE OF AIR QUALITY

**Polyfoam Packers Corporation, a Division of Tuscarora, Inc.
955 Woodland Avenue
Michigan City, Indiana 46360**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Second Minor Source Modification No.: 091-15886-00079	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates stationary polystyrene shape molding operations.

Responsible Official:	Ken Sears and Victoria Brind'Amour
Source Address:	955 Woodland Avenue, Michigan City, Indiana 46360
Mailing Address:	955 Woodland Avenue, Michigan City, Indiana 46360
SIC Code:	3086
County Location:	LaPorte
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- 30) Two (2) molding presses, model type Kurtz K813, identified as MP28 and MP29, each rated at 150 pounds per hour.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This modification does not currently include any insignificant activities, as defined in 326 IAC 2-7-1(21).

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22).
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Two (2) molding presses, model type Kurtz K813, identified as MP28 and MP29, each rated at 150 pounds per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-7-10.5] [326 IAC 8-1-6]

Any change or modification that will cause VOC emissions from each of the molding presses identified as MP28, and MP29 to be equal to or greater than 25 tons per year shall require IDEM, OAM approval before such changes can take place.

Compliance Determination Requirements

D.1.2 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Minor Source Modification and Minor Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	Polyfoam Packers Corp., a Division of Tuscarora Inc.
Source Location:	955 Woodland Avenue, Michigan City, IN 46360
County:	LaPorte
SIC Code:	3086
Operation Permit No.:	T091-7666-00079
Operation Permit Issuance Date:	October 14, 1999
Minor Source Modification No.:	091-15886
Minor Permit Modification No.:	091-15930
Permit Reviewer:	Madhurima D. Moulik

The Office of Air Quality (OAQ) has reviewed a modification application from Polyfoam Packers Corp., a Division of Tuscarora Inc., relating to the operation of a polystyrene shape molding operation.

History

On July 17, 2002, Polyfoam Packers Corporation submitted an application to the OAQ requesting to remove three (3) existing molding presses, and add two (2) new molding presses to their existing plant. In addition, the source requested changes of responsible officials. Polyfoam Packers Corporation was issued a Part 70 permit on October 14, 1999.

New Emission Units

- (1) Two (2) molding presses, model type Kurtz K813, identified as MP28 and MP29, each rated at 150 pounds per hour.

Existing Approvals

The source was issued a Part 70 Operating Permit T091-7666-00079 on October 14, 1999. The source has since received the following:

- (a) First Administrative Amendment No.: 091-11627, issued on January 18, 2000;
- (b) First Minor Source Modification No.: 091-12933, issued on January 4, 2001;
- (c) Second Administrative Amendment No.: 091-13602, issued on January 17, 2001;
- (d) First Significant Source Modification No.: 091-14438, issued on November 2, 2001;

- (e) First Significant Permit Modification No.: 091-14496, issued on November 20, 2001;
- (f) Third Administrative Amendment No.: 091-15449, issued on March 20, 2002;
- (g) Second Significant Source Modification No.: 091-15084, issued on March 4, 2002; and
- (h) Second Significant Permit Modification No.: 091-15559, issued on July 22, 2002.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Minor Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on July 17, 2002.

Emission Calculations

Capacity of each Kurtz K813 molding press = 150 lb/hr

Maximum pentane (VOC) content of material used = 5.5%

VOC loss rate from molding press = 14% (based on loss rate used for similar presses, see TSD for Significant Source Modification No: 091-14438)

Therefore, from two (2) molding presses, potential to emit of VOC

$$= 2 \times 150 \text{ lb/hr} \times 0.055 \times 0.14$$

$$= 2.31 \text{ lb/hr} = 2.31 \text{ lb/hr} \times 8760 \text{ hr/yr} / 2000 \text{ lb/ton}$$

$$= 10.1 \text{ tons per year}$$

Potential To Emit of the Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential To Emit (tons/year)
PM	Negligible
PM-10	Negligible
SO ₂	Negligible
VOC	10.1
CO	Negligible

NO _x	Negligible
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Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

Justification for the Modification

The Part 70 Operating permit is being modified through a Part 70 Minor Source Modification and Minor Permit Modification. The Minor Source Modification is being performed pursuant to 326 IAC 2-7-10.5(d)(4)(B)(iii) which states in part that Minor Permit Modification can be used for "Modifications that would have a potential to emit within any of the following ranges: less than twenty-five (25) tons per year and equal to or greater than ten (10) tons per year of volatile organic compounds". The Minor Permit Modification is being performed pursuant to 326 IAC 2-7-12(b)(1)(A) and (B) which state that a Minor Permit Modification can be used for modifications that "do not violate any applicable requirement" and "do not involve significant changes to existing monitoring, reporting, or record keeping requirements in the Part 70 permit".

County Attainment Status

The source is located in LaPorte County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. LaPorte County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (a) LaPorte County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	less than 100
PM-10	less than 100
SO ₂	less than 100
VOC	greater than 100 less than 250
CO	less than 100

NO _x	less than 100
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- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions are based upon the source emissions as calculated in the Technical Support Document for the Second Significant Source Modification No. 091-15084, issued on March 3, 2002.

Potential to Emit After Controls for the Modification

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units for the modification.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Existing Source ¹	46.04	0.18	0.01	< 250	2.02	2.40	--
2 New Presses	--	--	--	10.1	--	--	--
Total Emissions	46.04	0.18	0.01	< 250 *	2.02	2.40	--

¹ Based on the Potential to Emit after controls of entire source calculated in the Second Significant Source Modification No. 091-15084, issued on March 3, 2002.

*The source has agreed to maintain the VOC limit of less than 249 tons per year (20.75 tons per month) even with the addition of the two (2) molding presses to their existing operation. Thus, the source will still maintain its PSD minor source status.

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2 and 40 CFR 52.21, the PSD requirements do not apply.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

The state rule applicability for the source remains unchanged as a result of this modification.

State Rule Applicability - Individual Facilities

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)

The two (2) new molding presses are not subject to this rule because each of the presses has the potential to emit (uncontrolled) VOC less than 25 tons per year. Therefore, 326 IAC 8-1-6 does not apply.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of the two (2) molding presses will not emit any HAP. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 6-3-2 (Process Operations)

The two (2) new molding presses are not subject to 326 IAC 6-3-2 (Process Operations) because they do not emit any PM.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

There are no compliance requirements for the equipment covered under this approval.

Conclusion

This Minor Source Modification and Minor Permit Modification shall be subject to the conditions of the attached Minor Source Modification No. 091-15886 and Minor Permit Modification No. 091-15930.

CHANGES TO THE PART 70 PERMIT

1. The Responsible Official name has been changed from "Phil McKittrick" to "Ken Sears and Victoria Brind'Amour", who are the Manufacturing Manager, and Manager of Environmental Affairs, Safety, and Health, and meet the definition of Responsible Official under 326 IAC 2-7-11(34).

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates stationary polystyrene shape molding operations.

Responsible Official:	Phil McKittrick Ken Sears and Victoria Brind'Amour
Source Address:	955 Woodland Avenue, Michigan City, Indiana 46360
Mailing Address:	955 Woodland Avenue, Michigan City, Indiana 46360
SIC Code:	3086
County Location:	LaPorte
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD

2. The facility description in Section A.2 is modified as follows (~~strike out~~ to show deletions and **bold** to show additions):

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- 1) One (1) boiler, model number CB 700-250, fueled by natural gas, heat input rate is 10.5 MMBtu per hour and exhausting to stack S-1.

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- 17) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-21.

- ~~18) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-22.~~

- 19 8)** One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-23.

- ~~20~~ **19)** One (1) molding press, model number BR 620, rated at 100 pounds per hour, and

exhausting to stack S-24.

- 24 0) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-25.
- 22 1) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-26.
- 23 2) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-27.
- ~~24) One (1) molding press, Kohler model 609, rated at 400 pounds per hour and exhausting to Stack S-10.~~
- 25 3) One (1) molding press, model number 1317, identified as P001, rated at 600 pounds per hour, and exhausting to stack S-28.
- 26 4) One (1) molding press, model number 813, identified as P001, rated at 300 pounds per hour, and exhausting to stack S-29.
- 27 5) One (1) molding press, model number 68, identified as P001, rated at 150 pounds per hour, and exhausting to stack S-30.
- 28 6) One (1) molding press, model number 68, identified as P001, rated at 150 pounds per hour, and exhausting to stack S-31.
- 29 7) One (1) molding press, model number 68, identified as P001, rated at 150 pounds per hour, and exhausting to stack S-32.
- ~~30 28) One (1) molding press, model number 68, identified as P001, rated at 150 pounds per hour, and exhausting to stack S-33.~~
- ~~31) One (1) molding press, model number EHV-C, identified as P001, rated at 300 pounds per hour, and exhausting to stack S-34.~~
- 32 29) Sixteen (16) post expansion storage silos, identified as F28, each with a total maximum storage capacity of 972 pounds.
- 30) Two (2) molding presses, model type Kurtz K813, identified as MP28 and MP29, each rated at 150 pounds per hour.**

3. The facility description in Section D.2 is modified as follows:

Facility Description [326 IAC 2-7-5(15)]

Thirty-one (31) foam polystyrene storage silo with a maximum storage silo with a maximum storage capacity of 76,000 pounds.

One (1) polystyrene pre expander, model number 6000, rated at 1500 pounds per hour and exhausting to stack S-4.

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One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-21.

~~One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-22.~~

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-23.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-24.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-25.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-26.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-27.

~~One (1) molding press, Kohler model 609, rated at 400 pounds per hour, and exhausting to Stack S-10.~~

One (1) molding press, model number 1317, identified as P001, rated at 600 pounds per hour, and exhausting to stack S-28.

One (1) molding press, model number 813, identified as P001, rated at 300 pounds per hour, and exhausting to stack S-29.

One (1) molding press, model number 68, identified as P001, rated at 150 pounds per hour, and exhausting to stack S-30.

One (1) molding press, model number 68, identified as P001, rated at 150 pounds per hour, and exhausting to stack S-31.

One (1) molding press, model number 68, identified as P001, rated at 150 pounds per hour, and exhausting to stack S-32.

One (1) molding press, model number 68, identified as P001, rated at 150 pounds per hour, and exhausting to stack S-33.

~~One (1) molding press, model number EHV-C, identified as P001, rated at 300 pounds per hour, and exhausting to stack S-34.~~

Sixteen (16) post expansion storage silos, identified as F28, each with a total maximum storage capacity of 972 pounds.

Two (2) molding presses, model type Kurtz K813, identified as MP28 and MP29, each rated at 150 pounds per hour.

4. The Condition D.2.5 is modified as follows:

D.2.5 Volatile Organic Compounds (VOC) [326 IAC 2-7-10.5] [326 IAC 8-1-6]

Any change or modification that will cause VOC emissions from **each of** the molding presses identified as P001, **MP28, and MP29** to be equal to or greater than 25 tons per year shall require IDEM, OAM approval before such changes can take place.